

Bold
IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

DEJARNETTE BLANCHARD
BABANGIDA ADAM
KENNETH BLANCHARD
TERRY BOOTH
aka "Shiesty"
AUSTIN COBURN
NORMAN DAVIS
LAWRENCE GRAY
TERRY JAMES
CLINTON MCLAUGHLIN
TAEMON POSEY
DEMETRIUS REYNOLDS
MARKEL SAYLES
GILBERT SMITH
ORIES SMITH
DENZEL TOMLIN
DAMOR WILLIAMS

Criminal No. 23-*180*

(21 U.S.C. §§ 846, 841(a)(1),
841(b)(1)(B)(ii), 841(B)(1)(B)(vi),
841(b)(1)(C); 18 U.S.C. §§ 922(g)(1),
924(c)(1)(A)(i), 924(e))

[UNDER SEAL]

FILED

AUG 15 2023

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

INDICTMENT

COUNT ONE

The grand jury charges:

From in and around December 2022, and continuing thereafter to in and around August 2023, in the Western District of Pennsylvania, the defendants, DEJARNETTE BLANCHARD, BABANGIDA ADAM, KENNETH BLANCHARD, TERRY BOOTH (aka "Shiesty"), AUSTIN COBURN, NORMAN DAVIS, LAWRENCE GRAY, TERRY JAMES, CLINTON MCLAUGHLIN, TAEMON POSEY, DEMETRIUS REYNOLDS, MARKEL SAYLES, GILBERT SMITH, ORIES SMITH, DENZEL TOMLIN, and DAMOR WILLIAMS,

did knowingly, intentionally and unlawfully conspire with one another and with persons both known and unknown to the grand jury, to possess with intent to distribute and distribute a quantity of a mixture and substance containing a detectable amount of a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1).

Further, the grand jury finds that each of the defendants is individually responsible for the amounts set forth below, as a result of the defendant's own conduct and the conduct of other conspirators that was reasonably foreseeable to the defendant:

DEJARNETTE BLANCHARD	400 grams or more of a mixture and substance containing a detectable amount of fentanyl A quantity of a mixture and substance containing a detectable amount of cocaine base (in the form commonly known as "crack")	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(vi) 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
BABANGIDA ADAM	400 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(vi)
KENNETH BLANCHARD	40 grams or more of a mixture and substance containing a detectable amount of fentanyl A quantity of a mixture and substance containing a detectable amount of cocaine base (in the form commonly known as "crack")	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi) 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
TERRY BOOTH aka "Shiesty"	40 grams or more of a mixture and substance containing a detectable amount of fentanyl A quantity of a mixture and substance containing a detectable amount cocaine	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi) 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)

	base (in the form commonly known as "crack")	
AUSTIN COBURN	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
NORMAN DAVIS	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
LAWRENCE GRAY	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
TERRY JAMES	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
CLINTON MCLAUGHLIN	A quantity of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
TAEMON POSEY	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
	A quantity of a mixture and substance containing a detectable amount cocaine base (in the form commonly known as "crack")	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
DEMETRIUS REYNOLDS	400 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(vi)
	A quantity of a mixture and substance containing a detectable amount cocaine base (in the form commonly known as "crack")	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)

MARKEL SAYLES	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
	A quantity of a mixture and substance containing a detectable amount of cocaine base (in the form commonly known as "crack")	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
GILBERT SMITH	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
ORIES SMITH	400 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(vi)
	A quantity of a mixture and substance containing a detectable amount of cocaine base (in the form commonly known as "crack")	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
DENZEL TOMLIN	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
DAMOR WILLIAMS	40 grams or more of a mixture and substance containing a detectable amount of fentanyl	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi)
	A quantity of a mixture and substance containing a detectable amount cocaine base (in the form commonly known as "crack")	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

The grand jury further charges:

On or about June 16, 2023, in the Western District of Pennsylvania, the defendant, DEJARNETTE BLANCHARD, did knowingly, intentionally and unlawfully possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, which were seized from his person.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii), and 841(b)(1)(B)(vi).

COUNT THREE

The grand jury further charges:

On or about June 16, 2023, in the Western District of Pennsylvania, the defendant, DEJARNETTE BLANCHARD, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely,

1. Conspiracy to distribute and possess with intent to distribute less than 100 grams of heroin, a violation of 21 U.S.C. § 846, on or about June 11, 2011, at Criminal Number 11-281, in the United States District Court for the Western District of Pennsylvania; and

2. Conspiracy to commit Hobbs Act robbery, a violation of 18 U.S.C. § 1951(a), on or about June 11, 2011, at Criminal Number 10-224, in the United States District Court for the Western District of Pennsylvania; and

3. Manufacture, delivery, or possession with intent to deliver a controlled substance, a violation of 35 P.S. § 780-113(a)(30), on or about March 1, 2017, at Docket Number 2421-2017, in the Court of Common Pleas of Allegheny County, Pennsylvania; knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, to wit: a .40 caliber semiautomatic Glock pistol bearing serial number NYP966, and .40 caliber ammunition, which were seized from DEJARNETTE BLANCHARD's person.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

The grand jury further charges:

On or about June 16, 2023, in the Western District of Pennsylvania, the defendant, DEJARNETTE BLANCHARD, did knowingly and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), charged at Count Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIVE

The grand jury further charges:

On or about June 16, 2023, in the Western District of Pennsylvania, the defendant, DEJARNETTE BLANCHARD, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely,

1. Conspiracy to distribute and possess with intent to distribute less than 100 grams of heroin, a violation of 21 U.S.C. § 846, on or about June 11, 2011, at Criminal Number 11-281, in the United States District Court for the Western District of Pennsylvania;

2. Conspiracy to commit Hobbs Act robbery, a violation of 18 U.S.C. § 1951(a), on or about June 11, 2011, at Criminal Number 10-224, in the United States District Court for the Western District of Pennsylvania; and

3. Manufacture, delivery or possession with intent to deliver a controlled substance, a violation of 35 P.S. § 780-113(a)(30), on or about March 1, 2017, at Docket Number 2421-2017, in the Court of Common Pleas of Allegheny County, Pennsylvania; knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, to wit: a 7.62 caliber semiautomatic American Tactical rifle bearing serial number SBJ442785, and 7.62 caliber ammunition, which were seized from a residence located at 260 Oak Hill Drive, Pittsburgh, PA 15213.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

The grand jury further charges:

On or about June 16, 2023, in the Western District of Pennsylvania, the defendants, DEJARNETTE BLANCHARD and KENNETH BLANCHARD, did knowingly, intentionally and unlawfully possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2- phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base (in the form commonly known as “crack”), a Schedule II controlled substance, which were seized from the residence located at 1417 Evandale Road, Pittsburgh, PA 15212.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vi), and 841(b)(1)(C).

COUNT SEVEN

The grand jury further charges:

On or about April 20, 2023, in the Western District of Pennsylvania, the defendant, BABANGIDA ADAM, did knowingly, intentionally and unlawfully possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi).

COUNT EIGHT

The grand jury further charges:

On or about April 20, 2023, in the Western District of Pennsylvania, the defendant, BABANGIDA ADAM, did knowingly and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), charged at Count Seven of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT NINE

The grand jury further charges:

On or about March 18, 2023, in the Western District of Pennsylvania, the defendant, TERRY BOOTH, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base (in the form commonly known as “crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

The grand jury further charges:

On or about June 9, 2023, in the Western District of Pennsylvania, the defendant, NORMAN DAVIS, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base (in the form commonly known as “crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

The grand jury further charges:

On or about June 9, 2023, in the Western District of Pennsylvania, the defendant, NORMAN DAVIS, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely,

1. Robbery, a violation of 18 Pa.C.S. § 3701(a)(1)(iv), on or about November 21, 2005, at Docket Number 15219-2004, in the Court of Common Pleas of Allegheny County, Pennsylvania;

2. Firearms not to be carried without a license, a violation of 18 Pa.C.S. § 6106, on or about November 21, 2005, at Docket Number 599-2005, in the Court of Common Pleas of Allegheny County, Pennsylvania;

3. Manufacture, delivery or possession with intent to deliver a controlled substance, a violation of 35 P.S. § 780-113(a)(30), on or about February 8, 2007, at Docket Number 14321-2005, in the Court of Common Pleas of Allegheny County, Pennsylvania;

4. Conspiracy to manufacture, deliver, or possess with intent to deliver a controlled substance, a violation of 18 Pa.C.S. § 903, on or about May 24, 2012, at Docket Number 4351-2011, in the Court of Common Pleas of Allegheny County, Pennsylvania; knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, to wit: a nine-millimeter semiautomatic Beretta pistol bearing serial number A077505X, and nine-millimeter ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT TWELVE

The grand jury further charges:

On or about June 9, 2023, in the Western District of Pennsylvania, the defendant, NORMAN DAVIS, did knowingly and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), charged at Count Ten of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT THIRTEEN

The grand jury further charges:

On or about August 3, 2023, in the Western District of Pennsylvania, the defendant, TERRY JAMES, did knowingly, intentionally and unlawfully distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2- phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

The grand jury further charges:

On or about August 3, 2023, in the Western District of Pennsylvania, the defendant, TERRY JAMES, did knowingly and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, distribution and possession with intent to distribute a controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), charged at Count Thirteen of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIFTEEN

The grand jury further charges:

On or about July 27, 2023, in the Western District of Pennsylvania, the defendant, DEMETRIUS REYNOLDS, did knowingly, intentionally and unlawfully possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi).

COUNT SIXTEEN

The grand jury further charges:

On or about July 27, 2023, in the Western District of Pennsylvania, the defendant, DEMETRIUS REYNOLDS, did knowingly and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), charged at Count Fifteen of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVENTEEN

The grand jury further charges:

On or about June 2, 2023, in the Western District of Pennsylvania, the defendant, DENZEL TOMLIN, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

The grand jury further charges:

On or about June 2, 2023, in the Western District of Pennsylvania, the defendant, DENZEL TOMLIN, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely:

1. Possession of firearm with altered manufacturer's number, a violation of 18 Pa.C.S. § 6110.2, on or about August 31, 2018, at Docket Number 14086-2017, in the Court of Common Pleas of Allegheny County, Pennsylvania; and

2. Firearm not to be carried without a license, a violation of 18 Pa.C.S. § 6106, on or about August 31, 2018, at Docket Number 14086-2017, in the Court of Common Pleas of Allegheny County, Pennsylvania;

knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, to wit: a nine-millimeter semiautomatic Glock pistol bearing serial number BMFE148, and nine-millimeter ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINETEEN

The grand jury further charges:

On or about June 2, 2023, in the Western District of Pennsylvania, the defendant, DENZEL TOMLIN, did knowingly and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), charged at Count Seventeen of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF SPECIAL FINDINGS

1. As to Counts One, Two, and Six, the defendant, DEJARNETTE BLANCHARD:

(a) was previously convicted and sentenced on or about June 11, 2011, at Criminal Number 11-281, in the United States District Court for the Western District of Pennsylvania, of the crime of conspiracy to distribute less than 100 grams of heroin, in violation of 21 U.S.C. § 846 (a serious drug felony under 21 U.S.C. §802(57));

(b) served a term of imprisonment of more than twelve months for the offense described in Subparagraph 1(a); and

(c) was released from any term of imprisonment for the offense described in Subparagraph 1(a) within fifteen years of the commencement of each of the offenses charged in Counts One, Two, and Six.

2. As to Count One, the defendant, NORMAN DAVIS:

(a) was previously convicted and sentenced on or about February 8, 2007, at Docket Number CP-02-CR-14321-2005, in the Court of Common Pleas of Allegheny County, Commonwealth of Pennsylvania, of the crime manufacture, delivery, or possession with intent to deliver a controlled substance, in violation of 35 P.S. § 780-113(a)(30) (a serious drug felony under 21 U.S.C. § 802(57));

(b) served a term of imprisonment of more than twelve months for the offense described in Subparagraph 3(a); and

(c) was released from any term of imprisonment for the offense described in Subparagraph 3(a) within fifteen years of the commencement of the offense charged in Count One.

3. As to Count Eleven, the defendant, NORMAN DAVIS, was convicted of the following serious drug offenses and violent felony offense (as defined in 18 U.S.C. § 924(e)(2)(A)), each of which was committed on occasions different from one another. That is, NORMAN DAVIS was previously convicted and sentenced for the crimes of:

(a) Robbery, a violation of 18 Pa.C.S. § 3701(a)(1)(iv), on or about November 21, 2005, at Docket Number 15219-2004, in the Court of Common Pleas of Allegheny County, Pennsylvania, for events occurring on or about November 20, 2004;

(b) Manufacture, delivery or possession with intent to deliver a controlled substance, a violation of 35 P.S. § 780-113(a)(30), on or about February 8, 2007, at Docket Number 14321-2005, in the Court of Common Pleas of Allegheny County, Pennsylvania, for events occurring on or about August 1, 2005; and

(c) Conspiracy to manufacture, deliver, or possess with intent to deliver a controlled substance, a violation of 18 Pa.C.S. § 903, on or about May 24, 2012, at Docket Number 4351-2011, in the Court of Common Pleas of Allegheny County, Pennsylvania, for events occurring on or about January 9, 2011.

4. As to Count One, the defendant, LAWRENCE GRAY:

(a) was previously convicted and sentenced on or about September 23, 2004, at Docket Number CP-02-CR-5630-2004, in the Court of Common Pleas of Allegheny County, Commonwealth of Pennsylvania, of the crime of manufacture, delivery, or possession with intent to deliver a controlled substance, in violation of 35 P.S. § 780-113(a)(30) (a serious drug felony under 21 U.S.C. § 802(57));

(b) served a term of imprisonment of more than twelve months for the offense described in Subparagraph 2(a); and

(c) was released from any term of imprisonment for the offense described in Subparagraph 2(a) within fifteen years of the commencement of the offense charged in Count One.

FORFEITURE ALLEGATIONS

The United States hereby gives notice to the defendants charged in Counts One, Two, Six, Seven, Nine, Ten, Thirteen, Fifteen, and Seventeen that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), which requires any person convicted of these offenses to forfeit to the United States of America any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, from the commission of such offenses, and any property used, or intended to be used, in any manner and part, to commit, and to facilitate the commission of, such offenses, including, but not limited to, the following:

1. \$17,939 in U.S. currency, a .40 caliber semiautomatic Glock pistol bearing serial number NYP966, an extended magazine for the same, and .40 caliber ammunition, all of which was seized from the person of DEJARNETTE BLANCHARD on June 16, 2023;
2. a 7.62 caliber semiautomatic American Tactical rifle bearing serial number SBJ442785, magazines for the same, and 7.62 caliber ammunition, which were seized from a residence located at 260 Oak Hill Drive, Pittsburgh, PA on June 16, 2023;
3. \$ 70,875 in U.S. currency, a nine-millimeter semiautomatic Glock pistol bearing serial number MGR571, an extended magazine for the same, and nine-millimeter ammunition, which were seized from the person of BABANGIDA ADAM, and the residence located at 1810 W. Railroad Street, Carnegie, PA, on April 20, 2023;
4. \$ 4,367 in U.S. currency, a nine-millimeter semiautomatic Beretta pistol bearing serial number A077505X, a magazine for the same, and nine-millimeter ammunition, which were seized from the person of NORMAN DAVIS and a black Cadillac being driven by NORMAN DAVIS on June 9, 2023;

5. \$ 17,863 in U.S. currency seized from the residence located at 1710 High Street, Apt. 3, Pittsburgh, PA, on June 16, 2023;

6. \$ 553 in U.S. currency seized from the residence located at 1417 Evandale Road, Pittsburgh, PA, on June 16, 2023;

7. a .40 caliber semiautomatic FN pistol bearing serial number CSU0008606, .40 caliber ammunition, and \$167 in U.S. currency, which were seized from the person of TERRY JAMES, on August 3, 2023;

8. \$4,675 in U.S. currency, a .45 caliber semiautomatic Glock pistol bearing serial number BWW5422, a 5.56 mm Delton AR-style rifle bearing serial number B72511, a 9 mm semiautomatic FN pistol bearing serial number GKS0111137, and ammunition, which were seized from the residence located at 5205 Glenwood Avenue, Pittsburgh, PA 15207 on July 27, 2023;

9. \$ 4,492 in U.S. currency, a 7.62 x 39 mm semiautomatic Romarm Mini Draco rifle bearing serial number ROA-22-PG-6784, and 7.62 x 39 mm ammunition, seized from the residence located at 75 Knox Avenue, Pittsburgh, PA, on June 7, 2023; and

10. a nine-millimeter semiautomatic Glock pistol, bearing serial number BMFE148, a black magazine for the same, a Glock extended magazine, an RWB 50-round drum magazine, and nine-millimeter ammunition, which were seized from a residence located at 5 Rosamond Street, McKees Rocks, PA, on June 2, 2023.

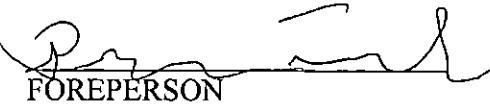
The United States hereby gives notice to the defendants charged in Counts Three, Four, Five, Eight, Eleven, Twelve, Fourteen, Sixteen, Eighteen, and Nineteen that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), which requires any person convicted of these offenses to forfeit to the United States of America any and

all firearms and ammunition involved in, used in, or intended to be used in the knowing commission of the offense, including, but not limited to:

1. a .40 caliber semiautomatic Glock pistol bearing serial number NYP966, an extended magazine for the same, and .40 caliber ammunition, which were seized from the person of DEJARNETTE BLANCHARD, on June 16, 2023;
2. a 7.62 caliber semiautomatic American Tactical rifle bearing serial number SBJ442785, magazines for the same, and 7.62 caliber ammunition, which were seized from a residence located at 260 Oak Hill Drive, Pittsburgh, PA, on June 16, 2023;
3. a nine-millimeter semiautomatic Glock pistol bearing serial number MGR571, an extended magazine for the same, and nine-millimeter ammunition, which were seized from a residence located at 1810 W. Railroad Street, Carnegie, PA, on April 20, 2023;
4. a nine-millimeter semiautomatic Beretta pistol bearing serial number A077505X, a magazine for the same, and nine-millimeter ammunition, which were seized from a black Cadillac being driven by NORMAN DAVIS, on June 9, 2023;
5. a .40 caliber semiautomatic FN pistol bearing serial number CSU0008606, and .40 caliber ammunition, which were seized from the person of TERRY JAMES, on August 3, 2023;
6. a .45 caliber semiautomatic Glock pistol bearing serial number BWW5422, a 5.56 mm Delton AR-style rifle bearing serial number B72511, a 9 mm semiautomatic FN pistol bearing serial number GKS0111137, and ammunition, which were seized from the residence located at 5205 Glenwood Avenue, Pittsburgh, PA 15207, on July 27, 2023; and
7. a nine-millimeter semiautomatic Glock pistol, bearing serial number BMFE148, a black magazine for the same, a Glock extended magazine, an RWB 50-round drum magazine, and nine-millimeter ammunition, which were seized from a residence located at 5

Rosamond Street, McKees Rocks, PA, on June 2, 2023.

A True Bill,



FOREPERSON



ERIC G. OLSAN
United States Attorney
IL ID No. 6290382



JEROME A. MOSCHETTA
Assistant United States Attorney
PA ID No. 203965